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15 *In Pro Per*

17 **UNITED STATES DISTRICT COURT**
18 **SOUTHERN DISTRICT OF CALIFORNIA**

20 CHRIS LANGER,

Case No. 14-CV-1076-WQH-JMA

21 Plaintiff,

**JOINT MOTION TO EXTEND
TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT**

22 v.

23 JEROME M. NAVARRA, in his
individual and representative capacity
24 as trustee of the Jerome Navarra Family
Trust; MANOUCHER M.
25 RAHNAMIE; and DOES 1-10,

26 Defendants.

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1 Plaintiff CHRIS LANGER (“Langer”) and Defendant JEROME NAVARRA
 2 (“Navarra”) through their respective counsel of record, and Defendant
 3 MANOUCHER RAHNAMIE (“Rahnamie”) on his own behalf, hereby jointly move
 4 for an order extending the time for Defendants to respond to Langer’s complaint.

5 On or about April 29, 2014, Langer filed his complaint in this action. On or
 6 about May 4, 2014, Langer served the summons and complaint on Navarra. On or
 7 about May 1, 2014, Langer served the summons and complaint on Rahnamie.
 8 Pursuant to Federal Rules of Civil Procedure Rule 12, Navarra’s response to
 9 Langer’s complaint would regularly be due on or before May 27, 2014, and
 10 Rahnamie’s response to Langer’s complaint would regularly be due on or before
 11 May 21, 2014. The parties have reached a verbal agreement on some but not all
 12 terms to settle this action in its entirety and have agreed that Defendants shall have
 13 additional time to respond to the complaint so that they may finalize the written
 14 settlement agreement without the need to file and oppose any pleading challenges,
 15 including but not limited to a motion to dismiss.

16 Accordingly, the parties hereby jointly move for an order providing that
 17 Defendants shall have until June 6, 2014, to respond to Langer’s complaint if said
 18 complaint is not dismissed prior to such time.

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 20 DATED: May 23, 2014

CENTER FOR DISABILITY ACCESS

21 By: /s/ Phyl Grace
 22 Mark Potter
 23 Phyl Grace
 24 Dennis Price
 25 Attorneys for Plaintiff Chris Langer
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1 DATED: May 23, 2014

McKENNA LONG & ALDRIDGE LLP

2 By: /s/ Tami Penner
3 Tami Penner
4 Attorneys for Defendant Jerome M. Navarra

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6 DATED: May 23, 2014

7 By: M. Rahnamai
8 Manoucher M. Rahnamaie

9 I, Tami J. Penner, hereby certify that the content of this joint motion is
10 acceptable to all parties who are required to sign this joint motion, and Plaintiff's
11 counsel authorized Defendant M. Navarra to affix her CM/ECF electronic signature
12 to this joint motion.

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14 DATED: May 23, 2014

McKENNA LONG & ALDRIDGE LLP

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17 By: /s/ Tami Penner
18 Tami Penner
19 Attorneys for Defendant Jerome M. Navarra

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